

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JAQUORI LYONS, et al,

Defendants.

Criminal No. 23-cr-10186-ADB

**DECLARATION OF DANIEL J. CLOHERTY IN SUPPORT OF
MOTION TO APPOINT A COORDINATING DISCOVERY ATTORNEY**

I, Daniel J. Cloherty, declare and state as follows:

1. I am the court-appointed attorney for Keyon Roberson in the above captioned case.
2. Thus far, 14 individuals are charged with allegations of a racketeering conspiracy, conspiracy to distribute controlled substances, possession with intent to distribute fentanyl, possession with intent to distribute marijuana, and possession of a firearm in furtherance of a drug trafficking crime in violation of Title 18, U.S.C. § 1962(d) in a five-count indictment. *See* Dkt. No. 57. All 14 individuals have appointed counsel.
3. To date the government has produced two discovery productions directly to defense counsel. *See* Dkt. No. 141. The government’s March 29, 2024, Status Report indicated: “the government will be producing additional discovery in multiple productions.” And Discovery includes “several hundred written reports, electronic materials (including recorded videos and social media postings), and materials related to search warrants.” *Id.* at 2–5. The April 3, 2024, Status Conference was continued to June 3, 2024, in part to allow defendants to pursue the potential use of a Coordinating Discovery Attorney. *Id.* at 6 and Dkt. No. 142.

4. The large volume and technical nature of discovery led counsel to seek the assistance of John C. Ellis, Jr. as a Coordinating Discovery Attorney. Mr. Ellis is an attorney in San Diego, California, and one of five national Coordinating Discovery Attorneys for the Administrative Office of U.S. Defender Services Office (DSO). His time will be paid by the DSO. His work can be shared with defense counsel and will help avoid duplicate time and costs organizing discovery.

5. All appointed counsel, who have provided input, join the motion to have Mr. Ellis appointed as a Coordinating Discovery Attorney in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct on May 13, 2024.

/s/ Daniel J. Cloherty _____
Daniel J. Cloherty